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COMMITTEE OF EXPERTS ON THE
TRANSPORT OF DANGEROUS GOODS

Sub-Committee of Experts on the
Transport of Dangerous Goods
(Fourteenth session,
Geneva, 8-18 December 1997,
agenda item 2 (c))

DRAFT AMENDMENTS TO THE MODEL REGULATIONS ON THE TRANSPORT OF DANGEROUS GOODS

Other packaging and IBC matters

Large packagings

Transmitted by the Expert of France

At the thirteenth session of the Sub-Committee, during the consideration of document ST/SG/AC.10/C.3/1997/35/Rev.1 on large packagings, France proposed that large fibreboard and wood packagings should be subject to a provision identical to that contained in paragraph 6.6.4.2.8 setting out the requirements for liners of flexible large packagings.

The proposal was not adopted at that session and France was invited to submit a proposal in writing to the Committee (ST/SG/AC.10/C.3/26, para. 57).

Proposal

This proposal uses the paragraph numbering in document ST/SG/AC.10/C.3/1997/35/Rev. 1, Annex B, as amended by document ST/SG/AC.10/C.3/26/Add.2.

1. Insert a new paragraph 6.6.4.4.9 for large fibreboard packagings, with the same wording as paragraph 6.6.4.2.8;

"6.6.4.4.9 Where used, a liner shall be made of a suitable material. The strength of the material used and the construction of the liner shall be appropriate to the capacity of the large packaging and the intended use. Joins and closures shall be sift-proof and capable of withstanding pressures and impacts liable to occur under normal conditions of transport."

2. Insert a new paragraph 6.6.4.5.11 for large packagings in wood, with the same wording as paragraph 6.6.4.2.8 (see 1 above).

Justification

The provisions for large packagings are based on those for IBCs. As a result, paragraph 6.6.4.2.8 concerning flexible large packagings reproduces almost verbatim the text of paragraph 6.5.3.2.10 on IBCs.

The same provision has also applied for a long time to fibreboard and wood IBCs, as can be seen in paragraphs 6.5.3.5.6 and 6.5.3.6.8, respectively, of the tenth edition of the model regulations. Because of a misunderstanding at the last session of the Sub-Committee, the French proposal was taken to be a new provision, whereas it actually involved old provisions in the case of fibreboard and wood IBCs.

For the sake of consistency, it would seem preferable to insert these provisions on liners also in the chapters on large packagings in fibreboard and wood.

This same principle was in fact applied by the Sub-Committee in adopting the United States proposal to add provisions on integral pallet bases: paragraphs 6.5.3.5.7 to 6.5.3.5.11 and 6.5.3.6.9 to 6.5.3.6.13, on IBCs, reproduced in 6.6.4.4.4 to 6.6.4.4.8 and 6.6.4.5.6 to 6.6.4.5.10 for large packagings (see document ST/SG/AC.10/C.3/26/Add.2).

Moreover, from a pragmatic standpoint, these provisions are far from unnecessary, as there is nothing to prevent a manufacturer from marketing a fibreboard or wood large packaging fitted with a liner, and it would be strange if the model regulations did not provide for this possibility.

It will be seen that paragraph 6.6.4.4.3 of the newly-adopted text implies the possible presence of such a liner as it stipulates that metal staples shall be protected so that the liner cannot be abraded or punctured by them.